

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Petition of Massachusetts Electric Company and Nantucket Electric)	
Company for approval of a distribution rate change for calendar year)	DTE 03-124
2004 for exogenous events.)	
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**ATTORNEY GENERAL'S
FIRST SET OF DOCUMENT AND INFORMATION REQUESTS
TO MASSACHUSETTS ELECTRIC COMPANY AND
NANTUCKET ELECTRIC COMPANY**

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to the Massachusetts Electric Company or the Nantucket Electric Company, its predecessors or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate **DATED** page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide four copies of each response.
16. The term "Company" refers to Massachusetts Electric Company and Nantucket Electric Company, and their predecessors. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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- AG-MECO-1-1** Please provide separately the amount of RPS compliance expenses incurred and revenues booked, certificate and Alternative Compliance Payment amounts that have been recovered in rates for each month back to the month the recovery began (see Hager Testimony, pages 11 and 12). Please provide default and standard offer services separately. Please supply separately the amounts for which the Company has contracted but has not received or paid for (Hager, page 11, lines 13-15). Please supply the data in an Excel spreadsheet file as well as in a paper version, and provide copies of all invoices and contracts supporting the expenses detailed in this response.
- AG-MECO-1-2** Please provide all calculations and workpapers to support the Alternative Compliance Payment data on page 11, line 17 of the Hager testimony.
- AG-MECO-1-3** Please show workpapers supporting the statement in the Hager testimony (page 15, lines 10 and 11) that transmission charges declined due to implementation of SMD by NEPOOL. Please show the basis for the rate reduction, the rate impact itself, and the dollars saved for each month since the reduction using the rate change and appropriate volumes. Please provide the data in an Excel spreadsheet file as well as in a paper version, and provide copies of all invoices and underlying contracts and/or tariff provisions supporting the amounts detailed in this response..

- AG-MECO-1-4** In footnote 4 of the Burns testimony (page 14), congestion costs are discussed as being a combination of reclassification and new costs. Please supply the authority that authorized the reclassification of costs, and provide the supporting document. Please show each category of cost (reclassification and new) for each month from March 2003 to present separately by load zone. Please explain the reason for the new costs. Supply the data in an Excel spreadsheet file as well as in a paper version.
- AG-MECO-1-5** Please provide copies of all supply contracts and bills supporting the costs described in Mr. Hager's testimony. Identify the contracts and bills by the designations ("Supplier 1", etc.) used in the testimony. Provide the cites to the contracts referred to on page 19, line 13 of Mr. Hager's testimony.
- AG-MECO-1-6** Describe the rate actions that MECO plans to take if it is able to support its position that congestion costs are the responsibility of the supplier (see Hager testimony, page 19, line 13; Burns testimony, page 12). How is MECO currently accounting for the supplier congestion costs being claimed as an exogenous cost at the current time? Please discuss each supplier contract separately. Provide copies of all mediation, arbitration, testimony, documents, appeals of arbitration, law suits, court filings and proceedings, activity, workpapers, or other attempts to resolve disputes associated with this issue.
- AG-MECO-1-7** Are GIS costs associated with default service included in this filing? If so, what is different between default supplier contracts and standard offer contracts that makes the GIS costs for default service the responsibility of the supplier and the GIS costs for standard offer the responsibility of the Company?
- AG-MECO-1-8** What other requirements does the NEPOOL GIS meet (Hager testimony, page 8, line 1-3)?
- AG-MECO-1-9** Please supply any studies, correspondence or presentations that discuss the implementation of GIS and/or any cost savings that would be realized because of implementing the system.
- AG-MECO-1-10** Please provide a breakdown of ISO-NE GIS costs into development and ongoing operations (see Burns testimony, page 7, lines 18 and 19) for each month that MECO has been billed.
- AG-MECO-1-11** How did MECO develop its environmental disclosure labels prior to using GIS (see Burns testimony, page 9, lines 3 to 6)?

- AG-MECO-1-12** Please provide all mediation, arbitration, testimony, documents, appeals of arbitration, law suits, court filings and proceedings, activity, workpapers, or other attempts to resolve disputes related to the provision of default and/or standard offer service associated with the supplier on pages 17 and 18 of the Hager testimony.
- AG-MECO-1-13** Please provide all exogenous changes greater than \$500,000 (positive and negative) that are not included in this filing because they don't satisfy the \$1 million requirement.
- AG-MECO-1-14** Please provide the cite(s) and quote the text in the Rate Plan Settlement (11/29/99) where it authorizes MECO to implement an exogenous factor for a change in supply costs.
- AG-MECO-1-15** Please individually describe and quantify the costs discussed on page 17, lines 10 to 19 in the Hager testimony.
- AG-MECO-1-16** Please list all supplier contracts for the Company. For each one, list the date it started, expiration date, service that it applies to (standard offer, default), whether congestion charges are applied to the supplier or the Company, the amount of congestion charges in the test period for each load zone, the annualized amount of congestion charges for each load zone, the amount of non-congestion charges in the test period, the annualized amount of non-congestion charges, and any other new charges being passed on to the Company.

February 6, 2004